

**Hearing Date: To be Determined**  
**Response Date: March 8, 2019**

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

In re

LEHMAN BROTHERS HOLDINGS INC., *et al.*,  
  
Debtors.

Chapter 11

Case No.  
08-13555 (SCC)

LEHMAN BROTHERS HOLDINGS INC.,

Plaintiff,

- against -

1ST ADVANTAGE MORTGAGE, L.L.C. *et al.*,  
  
Defendants.

Adversary Proceeding  
No. 16-01019 (SCC)

LEHMAN BROTHERS HOLDINGS INC.,

Plaintiff,

- against -

1AM, L.L.C., f/k/a 1ST ADVANTAGE MORTGAGE,  
L.L.C. *et al.*  
  
Defendants.

Adversary Proceeding  
No. 16-01377 (SCC)

LEHMAN BROTHERS HOLDINGS INC.,

Plaintiff,

- against -

AMERICAN BANK and CONGRESSIONAL  
BANCSHARES, INC. (successor-in-interest),  
  
Defendants.

Adversary Proceeding  
No. 16-01003 (SCC)

---

LEHMAN BROTHERS HOLDINGS INC.,

Plaintiff,

- against -

AMERICAN HOME EQUITY CORPORATION,

Defendants.

---

Adversary Proceeding  
No. 16-01300 (SCC)

---

LEHMAN BROTHERS HOLDINGS INC.,

Plaintiff,

-against-

AMERICAN LENDING NETWORK, INC.,

Defendant.

---

Adversary Proceeding  
No. 16-01347 (SCC)

---

LEHMAN BROTHERS HOLDINGS INC.,

Plaintiff,

- against -

AMERICA'S MORTGAGE ALLIANCE, INC. and  
AMERICA'S MORTGAGE, LLC,

Defendants.

---

Adversary Proceeding  
No. 16-01378 (SCC)

---

LEHMAN BROTHERS HOLDINGS INC.,

Plaintiff,

- against -

APPROVED FUNDING CORP.,

Defendants.

---

Adversary Proceeding  
No. 16-01284 (SCC)

---

LEHMAN BROTHERS HOLDINGS INC.,

Plaintiff,

- against -

ARLINGTON CAPITAL MORTGAGE CORPORATION  
and GATEWAY FUNDING DIVERSIFIED MORTGAGE  
SERVICES, LP,

Defendants.

---

Adversary Proceeding  
No. 16-01351 (SCC)

---

LEHMAN BROTHERS HOLDINGS INC.,

Plaintiff,

- against -

ATLANTIC BAY MORTGAGE GROUP, L.L.C.,

Defendants.

---

Adversary Proceeding  
No. 16-01311 (SCC)

---

LEHMAN BROTHERS HOLDINGS INC.,

Plaintiff,

- against -

AURORA FINANCIAL, LLC f/k/a AURORA  
MORTGAGE, LLC,

Defendants.

---

Adversary Proceeding  
No. 16-01312 (SCC)

---

LEHMAN BROTHERS HOLDINGS INC.,

Plaintiff,

-against-

BANK OF ENGLAND,

Defendant.

---

Adversary Proceeding  
No. 16-01285 (SCC)

LEHMAN BROTHERS HOLDINGS INC.,

Plaintiff,

- against -

BONDCORP REALTY SERVICES INC.,

Defendant.

Adversary Proceeding  
No. 16-01302 (SCC)

LEHMAN BROTHERS HOLDINGS INC.,

Plaintiff,

- against -

BROADVIEW MORTGAGE CORPORATION ,

Defendant.

Adversary Proceeding  
No. 16-01286 (SCC)

LEHMAN BROTHERS HOLDINGS INC.,

Plaintiff,

- against -

BWC MORTGAGE SERVICES, BWC REAL ESTATE  
INC. and COMMERCE HOME MORTGAGE, INC. f/k/a  
Simonich Corp.,

Defendants.

Adversary Proceeding  
No. 16-01376 (SCC)

LEHMAN BROTHERS HOLDINGS INC.,

Plaintiff,

- against -

CAPITAL BANK CORPORATION, as successor by merger  
to TIB Bank,

Defendant.

Adversary Proceeding  
No. 16-01367 (SCC)

---

LEHMAN BROTHERS HOLDINGS INC.,

Plaintiff,

- against -

CHERRY CREEK MORTGAGE CO., INC.,

Defendant.

---

Adversary Proceeding  
No. 16-01287 (SCC)

---

LEHMAN BROTHERS HOLDINGS INC.,

Plaintiff,

- against -

CIRCLE ONE MORTGAGE COMPANY and FIRST  
NATIONAL BANK,

Defendants.

---

Adversary Proceeding  
No. 16-01364 (SCC)

---

LEHMAN BROTHERS HOLDINGS INC.,

Plaintiff,

- against -

CITY FIRST MORTGAGE SERVICES, LLC,

Defendants.

---

Adversary Proceeding  
No. 16-01303 (SCC)

---

LEHMAN BROTHERS HOLDINGS INC.,

Plaintiff,

- against -

CORNERSTONE MORTGAGE, INC.,

Defendant.

---

Adversary Proceeding  
No. 16-01288 (SCC)

LEHMAN BROTHERS HOLDINGS INC.,

Plaintiff,

- against -

CRESTLINE FUNDING CORPORATION,

Defendant.

Adversary Proceeding  
No. 16-01306 (SCC)

LEHMAN BROTHERS HOLDINGS INC.,

Plaintiff,

- against -

DHI MORTGAGE COMPANY LTD.,

Defendant.

Adversary Proceeding  
No. 16-01374 (SCC)

LEHMAN BROTHERS HOLDINGS INC.,

Plaintiff,

- against -

DIRECTORS MORTGAGE, INC.,

Defendant.

Adversary Proceeding  
No. 16-01345 (SCC)

LEHMAN BROTHERS HOLDINGS INC.,

Plaintiff,

- against -

DIVERSIFIED CAPITAL FUNDING, INC. and  
AMERICAN PACIFIC MORTGAGE CORPORATION,  
individually and as successor by merger to Diversified  
Capital Funding, Inc.,

Defendants.

Adversary Proceeding  
No. 16-01360 (SCC)

LEHMAN BROTHERS HOLDINGS INC.,

Plaintiff,

- against -

FAIRMONT FUNDING LTD.,

Defendants.

Adversary Proceeding  
No. 16-01382 (SCC)

LEHMAN BROTHERS HOLDINGS INC.,

Plaintiff,

- against -

FIRST BANK,

Defendant.

Adversary Proceeding  
No. 16-01289 (SCC)

LEHMAN BROTHERS HOLDINGS INC.,

Plaintiff,

- against -

FIRST CALIFORNIA MORTGAGE COMPANY,

Defendant.

Adversary Proceeding  
No. 16-01313 (SCC)

LEHMAN BROTHERS HOLDINGS INC.,

Plaintiff,

- against -

FIRST CAPITAL GROUP, L.P. and FIRST CAPITAL  
CORPORATION OF LOS ANGELES,

Defendant.

Adversary Proceeding  
No. 16-01379 (SCC)

LEHMAN BROTHERS HOLDINGS INC.,

Plaintiff,

- against -

FIRST EQUITY MORTGAGE BANKERS, INC.,

Defendant.

Adversary Proceeding  
No. 16-01305 (SCC)

LEHMAN BROTHERS HOLDINGS INC.,

Plaintiff,

- against -

FIRST MORTGAGE CORPORATION,

Defendant.

Adversary Proceeding  
No. 16-01290 (SCC)

LEHMAN BROTHERS HOLDINGS INC.,

Plaintiff,

- against -

FIRST RESIDENTIAL MORTGAGE SERVICES  
CORPORATION,

Defendant.

Adversary Proceeding  
No. 16-01307 (SCC)

LEHMAN BROTHERS HOLDINGS INC.,

Plaintiff,

- against -

GATEWAY BANK FSB,

Defendant.

Adversary Proceeding  
No. 16-01363 (SCC)



LEHMAN BROTHERS HOLDINGS INC.,

Plaintiff,

- against -

GATEWAY MORTGAGE GROUP, LLC,

Defendant.

Adversary Proceeding  
No. 16-01291 (SCC)

LEHMAN BROTHERS HOLDINGS INC.,

Plaintiff,

- against -

GUARANTEED RATE, INC.,

Defendant.

Adversary Proceeding  
No. 16-01292 (SCC)

LEHMAN BROTHERS HOLDINGS INC.,

Plaintiff,

- against -

GUILD MORTGAGE COMPANY,

Defendant.

Adversary Proceeding  
No. 17-01001 (SCC)

LEHMAN BROTHERS HOLDINGS INC.,

Plaintiff,

- against -

HARTLAND MORTGAGE CENTERS, INC.,

Defendant.

Adversary Proceeding  
No. 16-01317 (SCC)

LEHMAN BROTHERS HOLDINGS INC.,

Plaintiff,

- against -

HOME CAPITAL FUNDING, d/b/a SECURITY ONE  
LENDING,

Defendant.

Adversary Proceeding  
No. 16-01344 (SCC)

LEHMAN BROTHERS HOLDINGS INC.,

Plaintiff,

- against -

HOME LOAN CENTER, INC.,

Defendant.

Adversary Proceeding  
No. 16-01342 (SCC)

LEHMAN BROTHERS HOLDINGS INC.,

Plaintiff,

- against -

HOME LOAN MORTGAGE CORPORATION,

Defendant.

Adversary Proceeding  
No. 16-01319 (SCC)

LEHMAN BROTHERS HOLDINGS INC.,

Plaintiff,

- against -

iFREEDOM DIRECT CORPORATION  
F/K/A NEW FREEDOM MORTGAGE CORP.,

Defendant.

Adversary Proceeding  
No. 15-01426 (SCC)

---

LEHMAN BROTHERS HOLDINGS INC.,

Plaintiff,

- against –

IMORTGAGE.COM, INC. and  
LOANDEPOT.COM, LLC,

Defendants.

---

Adversary Proceeding  
No. 16-01283 (SCC)

---

LEHMAN BROTHERS HOLDINGS INC.,

Plaintiff,

- against –

LAKELAND MORTGAGE CORPORATION,

Defendants.

---

Adversary Proceeding  
No. 16-01320 (SCC)

---

LEHMAN BROTHERS HOLDINGS INC.,

Plaintiff,

- against -

LOAN CORRESPONDENTS, INC.,

Defendant.

---

Adversary Proceeding  
No. 16-01337 (SCC)

---

LEHMAN BROTHERS HOLDINGS INC.,

Plaintiff,

- against -

MARIBELLA MORTGAGE, LLC,

Defendant.

---

Adversary Proceeding  
No. 16-01322 (SCC)

LEHMAN BROTHERS HOLDINGS INC.,

Plaintiff,

- against -

MC ADVANTAGE, LLC f/k/a REPUBLIC MORTGAGE  
HOME LOANS, LLC,

Defendant.

Adversary Proceeding  
No. 16-01334 (SCC)

LEHMAN BROTHERS HOLDINGS INC.,

Plaintiff,

- against -

MEGA CAPITAL FUNDING, INC.,

Defendant.

Adversary Proceeding  
No. 16-01304 (SCC)

LEHMAN BROTHERS HOLDINGS INC.,

Plaintiff,

- against -

MEGASTAR FINANCIAL CORP.,

Defendant.

Adversary Proceeding  
No. 16-01301 (SCC)

LEHMAN BROTHERS HOLDINGS INC.,

Plaintiff,

- against -

MORTGAGE CAPITAL ASSOCIATES, INC.,

Defendant.

Adversary Proceeding  
No. 16-01318 (SCC)

---

LEHMAN BROTHERS HOLDINGS INC.,

Plaintiff,

- against -

MOUNTAIN WEST FINANCIAL, INC.,

Defendant.

---

Adversary Proceeding  
No. 16-01349 (SCC)

---

LEHMAN BROTHERS HOLDINGS INC.,

Plaintiff,

- against -

NATIONAL FUNDING COMPANY, LLC,

Defendant.

---

Adversary Proceeding  
No. 16-01327 (SCC)

---

LEHMAN BROTHERS HOLDINGS INC.,

Plaintiff,

- against -

NEW FED MORTGAGE CORP.,

Defendant.

---

Adversary Proceeding  
No. 16-01299 (SCC)

---

LEHMAN BROTHERS HOLDINGS INC.,

Plaintiff,

- against -

NORTH ATLANTIC MORTGAGE CORPORATION,

Defendant.

---

Adversary Proceeding  
No. 16-01339 (SCC)

LEHMAN BROTHERS HOLDINGS INC.,

Plaintiff,

- against -

OAKTREE FUNDING CORP.,

Defendant.

Adversary Proceeding  
No. 16-01298 (SCC)

LEHMAN BROTHERS HOLDINGS INC.,

Plaintiff,

- against -

ORO REAL, INC.,

Defendant.

Adversary Proceeding  
No. 16-01330 (SCC)

LEHMAN BROTHERS HOLDINGS INC.,

Plaintiff,

- against -

PARAMOUNT RESIDENTIAL MORTGAGE GROUP,  
INC.,

Defendant.

Adversary Proceeding  
No. 16-01293 (SCC)

LEHMAN BROTHERS HOLDINGS INC.,

Plaintiff,

- against -

PARKSIDE LENDING, LLC,

Defendant.

Adversary Proceeding  
No. 16-01308 (SCC)

---

LEHMAN BROTHERS HOLDINGS INC.,

Plaintiff,

- against -

PMAC LENDING SERVICES, INC., individually and as  
successor by merger to PMC Bancorp, f/k/a Professional  
Mortgage Corp., and as successor by merger to Reliant  
Mortgage Company, LLC, and PMC BANCORP, f/k/a  
Professional Mortgage Corp., individually, and RELIANT  
MORTGAGE COMPANY, LLC, individually,

Defendants.

Adversary Proceeding  
No. 16-01353 (SCC)

---

LEHMAN BROTHERS HOLDINGS INC.,

Plaintiff,

- against -

POPULAR MORTGAGE CORP.,

Defendants.

Adversary Proceeding  
No. 16-01335 (SCC)

---

LEHMAN BROTHERS HOLDINGS INC.,

Plaintiff,

- against -

REPUBLIC STATE MORTGAGE CO., individually and as  
successor by merger to Union Trust Mortgage Corporation,

Defendant.

Adversary Proceeding  
No. 16-01365 (SCC)

---

LEHMAN BROTHERS HOLDINGS INC.,

Plaintiff,

- against -

RESIDENTIAL HOME FUNDING CORP.,

Defendant.

Adversary Proceeding  
No. 16-01361 (SCC)

LEHMAN BROTHERS HOLDINGS INC.,

Plaintiff,

- against -

RESPONSE MORTGAGE SERVICES, INC.,

Defendant.

Adversary Proceeding  
No. 16-01343 (SCC)

LEHMAN BROTHERS HOLDINGS INC.,

Plaintiff,

- against -

ROSS MORTGAGE CORPORATION,

Defendant.

Adversary Proceeding  
No. 16-01324 (SCC)

LEHMAN BROTHERS HOLDINGS INC.,

Plaintiff,

- against -

SACRAMENTO 1ST MORTGAGE, INC. individually and  
as successor by merger to COMSTOCK MORTGAGE,

Defendants.

Adversary Proceeding  
No. 16-01350 (SCC)

LEHMAN BROTHERS HOLDINGS INC.,

Plaintiff,

- against -

SANTANDER BANK, N.A., f/k/a Sovereign Bank, FSB,

Defendant.

Adversary Proceeding  
No. 16-01357 (SCC)



LEHMAN BROTHERS HOLDINGS INC.,

Plaintiff,

- against -

SECURITYNATIONAL MORTGAGE COMPANY,

Defendant.

Adversary Proceeding  
No. 16-01325 (SCC)

LEHMAN BROTHERS HOLDINGS INC.,

Plaintiff,

- against -

SHEA MORTGAGE INC.,

Defendant.

Adversary Proceeding  
No. 16-01294 (SCC)

LEHMAN BROTHERS HOLDINGS INC.,

Plaintiff,

- against -

SIERRA PACIFIC MORTGAGE COMPANY, INC.,

Defendant.

Adversary Proceeding  
No. 16-01341 (SCC)

LEHMAN BROTHERS HOLDINGS INC.,

Plaintiff,

- against -

SOUTHEAST FUNDING ALLIANCE, INC.,

Defendant.

Adversary Proceeding  
No. 16-01314 (SCC)

LEHMAN BROTHERS HOLDINGS INC.,

Plaintiff,

- against -

STEARNS LENDING, LLC,

Defendant.

Adversary Proceeding  
No. 16-01001 (SCC)

LEHMAN BROTHERS HOLDINGS INC.,

Plaintiff,

- against -

STERLING NATIONAL MORTGAGE COMPANY, INC.,

Defendant.

Adversary Proceeding  
No. 16-01316 (SCC)

LEHMAN BROTHERS HOLDINGS INC.,

Plaintiff,

- against -

SUBURBAN MORTGAGE, INC.,

Defendant.

Adversary Proceeding  
No. 16-01295 (SCC)

LEHMAN BROTHERS HOLDINGS INC.,

Plaintiff,

- against -

SUN AMERICAN MORTGAGE COMPANY,

Defendant.

Adversary Proceeding  
No. 16-01296 (SCC)

LEHMAN BROTHERS HOLDINGS INC.,

Plaintiff,

- against -

SUNSET MORTGAGE COMPANY L.P. and  
AVONWOOD CAPITAL CORPORATION,

Defendants.

Adversary Proceeding  
No. 16-01358 (SCC)

LEHMAN BROTHERS HOLDINGS INC.,

Plaintiff,

- against -

THE LENDING COMPANY, INC.,

Defendant.

Adversary Proceeding  
No. 16-01331 (SCC)

LEHMAN BROTHERS HOLDINGS INC.,

Plaintiff,

- against -

THE MORTGAGE STORE FINANCIAL, INC.,

Defendant.

Adversary Proceeding  
No. 16-01354 (SCC)

LEHMAN BROTHERS HOLDINGS INC.,

Plaintiff,

- against -

WEI MORTGAGE LLC f/k/a WEI MORTGAGE  
CORPORATION,

Defendant.

Adversary Proceeding  
No. 16-01346 (SCC)

LEHMAN BROTHERS HOLDINGS INC.,

Plaintiff,  
- against -

WINDSOR CAPITAL MORTGAGE CORPORATION,  
Defendant.

Adversary Proceeding  
No. 16-01333 (SCC)

LEHMAN BROTHERS HOLDINGS INC.,

Plaintiff,  
- against -

WINSTAR MORTGAGE PARTNERS, INC.,  
Defendant.

Adversary Proceeding  
No. 16-01371 (SCC)

LEHMAN BROTHERS HOLDINGS INC.,

Plaintiff,  
- against -

WINTRUST MORTGAGE CORPORATION,  
Defendant.

Adversary Proceeding  
No. 16-01369 (SCC)

LEHMAN BROTHERS HOLDINGS INC.,

Plaintiff,  
- against -

WJ CAPITAL CORPORATION, and SECURED CAPITAL  
FUNDING CORP., as successor by merger to WJ Capital  
Corporation,

Defendants.

Adversary Proceeding  
No. 16-01370 (SCC)

LEHMAN BROTHERS HOLDINGS INC.,

Plaintiff,

- against -

WR STARKEY MORTGAGE, LLP,

Defendant.

Adversary Proceeding  
No. 16-01326 (SCC)

**NOTICE OF MOTION OF MARITZA DOMINGUEZ BRASWELL  
TO WITHDRAW AS COUNSEL OF RECORD FOR  
LEHMAN BROTHERS HOLDINGS INC.**

**PLEASE TAKE NOTICE** that a Motion has been made by Fox Rothschild LLP and Maritza Dominguez Braswell for Ms. Braswell to withdraw as counsel of record for Lehman Brothers Holdings Inc. (“LBHI”).

**PLEASE TAKE FURTHER NOTICE** that objections, if any, shall be in writing, shall conform to the Federal Rules of Bankruptcy Procedure and the Local Rules of the Bankruptcy Court for the Southern District of New York, shall set forth the name of the objecting party, the basis for the objection and the specific grounds thereof, shall be filed with the Bankruptcy Court, together with proof of service, electronically in accordance with General Order M-399 (available at [www.nysb.uscourts.gov](http://www.nysb.uscourts.gov)) by registered users of the Bankruptcy Court’s electronic case filing system, and by all other parties in interest, on a 3.5 inch disk, compact disk, or flash drive, preferably in PDF format, WordPerfect or any other Windows-based word processing format (with two hard copies directly to Chambers), and shall be served upon (i) the Chambers of the Honorable Shelley C. Chapman, One Bowling Green, New York, New York 10004, Courtroom 623, (ii) Wollmuth Maher & Deutsch LLP, 500 Fifth Ave., New York, New York 10110 (Attn: William A. Maher, Esq. and Adam M. Bialek, Esq.), attorneys for LBHI, and (iii) Fox Rothschild LLP, 101

Park Avenue, Ste. 1700, New York, New York 10178 (Attn: Michael A. Rollin, Esq.) attorneys for LBHI, on or before **March 8, 2019 at 4:00 PM (ET) (the “Response Deadline”)**.

Any objections to the Motion will be addressed at a hearing on a date to be determined, before the Honorable Shelley C. Chapman, United States Bankruptcy Judge, at the United States Bankruptcy Court, One Bowling Green, Courtroom 623, New York, New York 10004.

### **ARGUMENT**

1. Pursuant to Local Rule 2090-1(e), an attorney who has appeared as attorney of record may withdraw or be replaced only by order of the Court for cause shown.

2. Ms. Braswell has been appointed Colorado Deputy Attorney General for Civil Litigation and Employment Law, and as such, will not be working at Fox Rothschild LLP for the duration of her appointment as Deputy Attorney General.

3. LBHI will not be prejudiced by the withdrawal of Ms. Braswell as counsel and Michael Rollin and Caleb Durling of Fox Rothschild LLP will continue to represent LBHI.

DATED: February 26, 2019

Respectfully submitted,

By: Michael A. Rollin

Michael A. Rollin

Caleb Durling

FOX ROTHSCHILD LLP

1225 17<sup>th</sup> Street, Ste. 2200

Denver, CO 80202

Telephone: (303) 292-1200

Facsimile: (303)292-1300

FOX ROTHSCHILD LLP

101 Park Avenue, Ste. 1700

New York, NY 10178

Telephone: (212) 878-7900

Facsimile: (212) 692-0940

- and -

William A. Maher  
Paul R. DeFilippo  
James N. Lawlor  
Adam M. Bialek  
Mara R. Lieber  
WOLLMUTH MAHER & DEUTSCH LLP  
500 Fifth Avenue  
New York, New York 10110  
Telephone: (212) 382-3300  
Facsimile: (212) 382-0050

*Counsel for Plaintiff Lehman Brothers  
Holdings Inc.*